

Exhibit 23

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Via Electronic Mail

Brian Ross, Esq.
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Britt M. Miller, Esq.
Mayer Brown
71 South Wacker Drive
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Re: *In re Dealer Management Systems Antitrust Litigation*, MDL No. 2817

Dear Britt and Brian:

We write to follow up on several discovery matters.

Discovery from Defendants

“Refresh” of Financial Information. Please find attached the basic financial information for which MDL Plaintiffs seek a refresh. We are evaluating the lists provided by Defendants for data from Plaintiffs. We note already that some of the items requested by Defendants are not “data sets” and generally outside the scope of any type of “financial information” refresh. But we can work through those issues in the meet and confer process. Like Defendants, we also reserve the right to modify our requested list as appropriate. Please review our requested information and let’s set a time to discuss.

OEM Pricing Information. Our proposal on OEM financial information is set out in our correspondence and prior discussions. Namely, we are seeking invoice-level data sets for the data integration provided by CDK and Reynolds to OEMs from as far back as Defendants have the information to the present, and the standard contracts with the OEMs for the data integration.

CDK has let us know that it believes its FTC-CID production includes this information – we thank you for that. We have been unable to locate the data sets and contracts in the FTC

production, however, and would please ask that you identify it by Bates number. We note, in particular, that CDK's subsidiaries at Integralink and DMI provided much of the data integration for the OEMs, and so the data information likely will come for those subsidiaries' files as well.

We have not received Reynolds' position on whether it will produce the OEM financial information and representative contracts. Please let us know.

Pre-2013 Documents regarding CDK's data access policies. Thank you for agreeing to conduct the search and review that CDK previously agreed it would do. We look forward to receiving the documents. Please let us know when CDK expects to produce them.

PX-442. We have asked Defendants to search for documents related to the contemplated CDK-Reynolds joint venture for data integration described in PX-442. Defendants have refused to conduct this targeted review on this highly relevant topic. We again ask Defendants to undertake a basic search for the original CDK proposal and any other reasonably available documents on this proposed joint venture. Please let us know if Defendants will do so.

Discovery from Authenticom, Mr. Lamm, and Mr. Gentry

Authenticom Archer Documents. As we noted, we have had difficulties exporting the located documents from Archer and processing them. We believe we are close to resolving the issues and will be in a position to produce the documents next week.

Updated Interrogatory Responses. We are evaluating whether the specified interrogatory responses need to be updated and will do so, as necessary, by the close of discovery.

Example Authenticom PCM Log. In response to Defendants' request – and the long backstory on this issue – we have discussed at length with Authenticom personnel what is possible. What we can do and are willing to offer is the PCM log for a random sample of 10 CDK dealers and 10 Reynolds dealers for a given day. Defendants have explained that they want sample PCM log so that they can see what information may be contained on PCM logs, and twenty total logs (beyond the example we have already provided) will be more than sufficient for that.

Presidio Technology Partners. Presidio Group produced 7,120 records and 23,463 pages of documents. Subject to Presidio Technology Partners' responses and objections, there are no other responsive documents that Presidio Technology Partners would have beyond what has already been produced by Presidio Group.

Russell Gentry Documents. With respect to the review for whether Mr. Gentry has responsive documents, if any, we will produce those documents on Friday. In terms of the parameters for Topic 8 (Reynolds) and Topic 9 (CDK) – which essentially ask for every document relating to Reynolds and CDK and are dramatically overbroad – the narrowed review for relevance pertains to CDK and Reynolds business practices on dealer use of independent integrators, usernames and passwords to CDK or Reynolds DMSs, CDK's SecurityFirst initiative, and CDK or Reynolds security protocols/enhancements.

Very truly yours,

s/ Elizabeth McKenna
Elizabeth McKenna

s/ Michael N. Nemelka
Michael N. Nemelka

Cc: Service External MDL Email List

List of Defendant Data Sources to Update

Defendant	Production	Date(s) Received	Start Date	End Date	Bates Numbers
CDK	CDK Invoice Data, used for both DMS and DIS	7/18/2018; 2/27/2019	Jan-09	Sep-17	Cdk-0701423.txt - Cdk-0701449.txt, CDK-3112783.txt - CDK-3112791.txt
CDK	DMI and Integralink Connections	2/27/19	Jan-13	Dec-18	CDK-3112792.xlsx
CDK	CDK Accounting Data	2/22/19	Jan-09	Dec-17	CDK-3112575.TXT - CDK-3112662.TXT, CDK-3112675.TXT - CDK-3112782.TXT
CDK	CDK Accounting Data Dictionaries	2/22/19	-	-	CDK-3112563.CSV - CDK-3112574.CSV, CDK-3112663.CSV - CDK-3112674.CSV
CDK	CDK FY16 Price Increase by Catalog Number	2/22/19	2016	2016	cdk-1220099.xlsx
CDK	CDK billing onsite by product	2/22/19	Mar-16	Mar-16	cdk-2027174.xlsx
Reynolds	Reynolds Invoice Data, used for DMS	7/18/18	Aug-14	Oct-17	Reymdl00133970.csv - Reymdl00134008.csv
Reynolds	Reynolds Invoice Data Dictionary	7/18/18	-	-	Reymdl00134009.Xlsx
					REYMDL00266984.XLSX, REYMDL00266986.XLSX, REYMDL00267147.XLSX, REYMDL00267316.XLSX, REYMDL00267320.XLSX, REYMDL00267393.XLSX, REYMDL00267513.XLSX, REYMDL00267532.XLSX, REYMDL00267544.XLSX, REYMDL00267558.XLSX, REYMDL00268923.XLSX, REYMDL00268925.XLSX, REYMDL00268927.XLSX, REYMDL00269179.XLSX, REYMDL00269180.XLSX, REYMDL00269455.XLSX - REYMDL00269458.XLSX, REYMDL00269738.XLSX, REYMDL00269759.XLSX, REYMDL00269794.XLSX, REYMDL00269796.XLSX, REYMDL00269800.XLSX, REYMDL00269802.XLSX, REYMDL00269867.XLSX, REYMDL00269872.XLSX, REYMDL00269936.XLSX, REYMDL00270076.XLSX, REYMDL00270078.XLSX, REYMDL00270080.XLSX, REYMDL00270528.XLSX, REYMDL00271274.XLSX, REYMDL00271278.XLSX, REYMDL00271284.XLSX, REYMDL00272121.XLSX, REYMDL00272408.XLSX, REYMDL00272414.XLSX, REYMDL00272418.XLSX, REYMDL00272422.XLSX, Reymdl00661921.xlsx, Reymdl00661924.xlsx - Reymdl00661939.xlsx, Reymdl00663621.xlsx - Reymdl00663637.xlsx, Reymdl00666092.xlsx, Reymdl00670823.xlsx, Reymdl00670826.xlsx - Reymdl00670841.xlsx
Reynolds	RCI Sales Data	10/16/2018; 12/10/2018	Jan-13	Aug-18	REYMDL01069605.xlsx
Reynolds	RCI Recurring Units Data	2/8/19	Jan-08	Dec-18	reymdl00133958.xls-reymdl00133967.xlsx
Reynolds	Reynolds' switching data	11/7/18	Jan-08	Dec-17	reymdl00154932.xls
Reynolds	RCI Active Product Report	1/25/19	Apr-02	Jun-17	reymdl00186057.xlsx
Reynolds	information regarding the integration packages for Dealer customers	1/25/19	N/A	N/A	REYMDL00162297; REYMDL00162298; REYMDL00162299
Reynolds	Revenue from CDK agreement	9/14/18	1/1/14	8/31/16	REYMDL00720416
Reynolds	Revenue from CDK agreement	12/21/18	1/1/17	7/31/17	REYMDL00719700
Reynolds	Revenue from CDK agreement	12/21/18	1/1/16	1/31/16	